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*Of Counsel*

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

THE UNITED STATES OF  
AMERICA,  
  
Plaintiff,  
  
v.  
  
KING MOUNTAIN TOBACCO CO.,  
INC.,  
  
Defendant.

Civil No. CV-12-3089-RMP

**DECLARATION OF W.  
CARL HANKLA IN  
SUPPORT OF UNITED  
STATES' REPLY TO  
DEFENDANT'S  
OPPOSITION TO MOTION  
FOR SUMMARY  
JUDGMENT**

**With Oral Argument  
July 30, 2014  
1:00 p.m., Yakima**

HANKLA DECLARATION

1  
2 I, W. Carl Hankla, declare as follows:

3 1. I am a trial attorney with the Tax Division of the United States  
4 Department of Justice.  
5

6 2. I have primary responsibility for representing the United States  
7 with respect to this matter, and I have custody of the official files maintained by  
8 the Tax Division for this matter. The documents referred to below are in those  
9 files.  
10

11 3. Attached hereto as **Exhibit A** is a true and correct copy of a file  
12 copy of a letter dated February 3, 2014 from the Criminal Division of the Justice  
13 Department to Thurla Skora of the Alcohol and Tobacco Tax and Trade Bureau.  
14 TTB has not yet received the forfeiture payment described therein.  
15

16 4. Attached hereto as **Exhibit B** is a true and correct copy of a file  
17 copy of a Stipulated Consent Judgment and Final Order of Forfeiture filed on  
18 March 25, 2014 in the civil action captioned therein.  
19

20 5. Attached hereto as **Exhibit C** is a true and correct copy of a file  
21 copy of a letter dated March 13, 2014 from me to opposing counsel transmitting  
22 a copy of the Declaration of Tonya Geis and exhibits and three three-ring  
23 binders of supporting computations.  
24  
25  
26

HANKLA DECLARATION

1  
2 6. Attached hereto as **Exhibit D** is a true and correct copy of a  
3 printout of an e-mail I sent to opposing counsel on February 26, 2014  
4 transmitting a copy of the Declaration of Tonya Geis and the exhibits thereto.  
5

6 7. Attached hereto as **Exhibit E** is a true and correct copy of a  
7 printout of an e-mail I sent to opposing counsel on February 26, 2014  
8 transmitting a copy of the Declaration of Allen Leftwich and the exhibits  
9 thereto.  
10

11 8. Attached hereto as **Exhibit F** is a true and correct copy of King  
12 Mountain's initial disclosures.  
13

14 I HEREBY DECLARE under penalty of perjury that the foregoing is true  
15 and correct.  
16

17 EXECUTED this 18th day of June, 2014.  
18

19 /s/ W. Carl Hankla  
20 W. CARL HANKLA  
21 Trial Attorney, Tax Division  
22 U.S. Department of Justice  
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HANKLA DECLARATION

**CERTIFICATE OF SERVICE**

I hereby certify that on this 18th day of June, 2014, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to the following:

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/s/ W. Carl Hankla  
W. CARL HANKLA  
Trial Attorney  
U.S. Department of Justice

HANKLA DECLARATION